

TSD File Inventory Index

Date: July 14, 2008

Initial: CM Guevara

Facility Name: <u>Hubert Krump (Technical & Engineering Center (Dr. Jella Site))</u>		
Facility Identification Number:		
A.1 General Correspondence		B.2 Permit Docket (B.1.2)
A.2 Part A / Interim Status	X	.1 Correspondence
.1 Correspondence	X	.2 All Other Permitting Documents (Not Part of the ARA)
.2 Notification and Acknowledgment	X	C.1 Compliance - (Inspection Reports)
.3 Part A Application and Amendments	X	C.2 Compliance/Enforcement
.4 Financial Insurance (Sudden, Non Sudden)	X	.1 Land Disposal Restriction Notifications
.5 Change Under Interim Status Requests		.2 Import/Export Notifications
.6 Annual and Biennial Reports		C.3 FOIA Exemptions - Non-Releasable Documents
A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment
.1 Correspondence		.1 RFA Correspondence
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A.4 Closure/Post Closure	X	.3 State Prelim. Investigation Memos
.1 Correspondence	X	.4 RFA Reports
.2 Closure/Post Closure Plans, Certificates, etc		D. 2 Corrective Action/Facility Investigation
A.5 Ambient Air Monitoring		.1 RFI Correspondence
.1 Correspondence		.2 RFI Workplan
.2 Reports		.3 RFI Program Reports and Oversight
B.1 Administrative Record		.4 RFI Draft /Final Report
		5. RFI QAPP

Total - 1

.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		D.5 Corrective Action/Enforcement	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		G.1 Risk Assessment	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI QAPP Correspondence		.9 Environmental Justice	
7			

Note: Transmittal Letter to Be Included with Reports.

Comments: *Be filed etc.*

**A.1 Public
Participation**

PUBLIC VOUCHER FOR ADVERTISING

DEPARTMENT OR ESTABLISHMENT, BUREAU OR OFFICE U.S. Environmental Protection Agency, Waste Management Branch		For Agency Use Only
PLACE VOUCHER PREPARED 1 S. Dearborn, Chicago, Illinois 60604		VOUCHER NUMBER
NAME OF PUBLICATION Tribune		DATE PREPARED 6-14-82
NAME OF PUBLISHER OR REPRESENTATIVE William Brown		SCHEDULE NUMBER
ADDRESS (Street, room number, city, State, and ZIP code) 210 E. Third St., Royal Oak, Mich. 48067 ATTN: Vi Baldwin FTS: 8-313-541-3000		PAID BY

CHARGES

TYPEFACE	(size of type)	POINT PER	(inch, square, word, or folio)
POINT PER			
Line Rates	NUMBER OR LINES (Indicate counted or space)	COST PER LINE	TOTAL COST
FIRST INSERTION JUNE 30, 1982	49 lines	\$.52	\$ 25.48
ADDITIONAL INSERTIONS GIVE NUMBER ▴			
TOTAL			\$ 25.48
Other Rates	NUMBER OF UNITS (Indicate inch, square, word, folio)	COST PER UNIT	TOTAL COST
FIRST INSERTION		\$	\$
ADDITIONAL INSERTIONS GIVE NUMBER ▴			
TOTAL			\$

<p>PUBLIC NOTICE</p> <p>The U.S. Environmental Protection Agency (USEPA) has received a closure plan from Sperry-Vickers for its hazardous waste storage facility located at 32661 Edwards Avenue, Madison Heights, Michigan, which has a maximum capacity of 695 gallons of corrosive wastes, spent halogenated solvents and flammable cleaning solvents. The plan to close the 3,200-square foot facility that was submitted on June 2, 1982 proposes removal of all hazardous wastes from the site by the completion of closure, which is scheduled for Sept. 1, 1982.</p> <p>The Sperry-Vickers plan was submitted to satisfy regulations promulgated under the Resource Conservation and Recovery Act. These were published under 40 CFR 265 Subpart G, which appeared in the Federal Register Jan. 12, 1982.</p> <p>The plan and related background materials are available to the public at USEPA Waste Management Branch, 111 W. Jackson, Chicago, Illinois, (312) 886-3713, from 8:30 a.m. to 4:30 p.m. Monday through Friday. These materials also may be seen at the Madison Heights Public Library, 240 W. 13 Mile Road, Madison Heights, Michigan, during business hours.</p> <p>Public comments concerning this application are requested by USEPA and will be accepted through July 31, 1982. Please send comments to:</p> <p style="text-align: center;">U.S. Environmental Protection Agency Region V RCRA Activities P.O. Box A3587 Chicago, Illinois 60690</p> <p style="text-align: center;">PUBLISHED: Wednesday, June 30, 1982 The Daily Tribune</p>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="padding: 5px;">TOTAL LINE RATES AND OTHER RATES</td> <td style="text-align: right; padding: 5px;">25.48</td> </tr> <tr> <td style="padding: 5px;">LESS DISCOUNT AT %</td> <td></td> </tr> <tr> <td style="padding: 5px;">BALANCE DUE</td> <td style="text-align: right; padding: 5px;">\$ 25.48</td> </tr> <tr> <td style="padding: 5px;">VERIFIED (Initials)</td> <td></td> </tr> </table> <p style="padding: 5px;">fications and copy, which has been completed.</p>	TOTAL LINE RATES AND OTHER RATES	25.48	LESS DISCOUNT AT %		BALANCE DUE	\$ 25.48	VERIFIED (Initials)	
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LESS DISCOUNT AT %									
BALANCE DUE	\$ 25.48								
VERIFIED (Initials)									

TITLE	DATE
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FOR AGENCY USE ONLY

ADVERTISEMENT PUBLISHED IN	DATE PUBLISHED
I certify that the advertisement described above appeared in the named publication and that this account is correct and eligible for payment.	
SIGNATURE AND TITLE OF CERTIFYING OFFICER	DATE
SIGNATURE AND TITLE OF AUTHORIZING OFFICER	DATE
ACCOUNTING CLASSIFICATION QW0027 2A3X05A000 2540 Estimate: \$31.20 6820200	PAID BY CHECK NUMBER

PUBLIC VOUCHER FOR ADVERTISING

DEPARTMENT OR ESTABLISHMENT, BUREAU OR OFFICE U.S. Environmental Protection Agency, Waste Management Branch		For Agency Use Only VOUCHER NUMBER
FORM VOUCHER PREPARED 10 S. Dearborn, Chicago, Illinois 60604	DATE PREPARED 6-14-82	SCHEDULE NUMBER
NAME OF PUBLICATION Tribune		PAID BY
NAME OF PUBLISHER OR REPRESENTATIVE William Brown		
ADDRESS (Street, room number, city, State, and ZIP code) 210 E. Third St., Royal Oak, Mich. 48067 ATTN: Vi Baldwin FTS: 8-313-541-3000		

CHARGES

TYPEFACE	(size of type)	POINT PER	(inch, square, word, or folio)																
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TOTAL			\$																
Attach one copy of advertisement (including upper and lower rules) to each copy of voucher here. If copy is not available sign the following affidavit.		TOTAL LINE RATES AND OTHER RATES																	
		LESS DISCOUNT AT %																	
		BALANCE DUE	\$																
		VERIFIED (Initials)																	

AFFIDAVIT

This represents a true billing for the attached advertising order, with specifications and copy, which has been completed.

SIGNATURE OF PUBLISHER OR REPRESENTATIVE

TITLE DATE

FOR AGENCY USE ONLY

ADVERTISEMENT PUBLISHED IN	DATE PUBLISHED
I certify that the advertisement described above appeared in the named publication and that this account is correct and eligible for payment.	
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ACCOUNTING CLASSIFICATION 2W0027 2A3X05A000 2540 Estimate: \$31.20 6820200	PAID BY CHECK NUMBER

* If the ability to certify and authority to approve are combined in one person enter "N/A" (not applicable) here.

U.S. GPO: 1974-555-598

ADVERTISING ORDER

ORDER NUMBER 56261NASX

DEPARTMENT OR ESTABLISHMENT, BUREAU OR OFFICE

U.S. Environmental Protection Agency, Waste Management Branch

DATE
6-14-82

The publisher of the publication named below is authorized to publish the enclosed advertisement according to the schedule below provided the rates are not in excess of the commercial rates

charged to private individuals with the usual discounts. It is to be set solid, without paragraphing, and without any display in the heading unless otherwise expressly authorized in the specifications.

NAME OF THE PUBLICATION ADVERTISED IN
Tribune

SUBJECT OF ADVERTISEMENT
Public Notice

EDITION OF PAPER ADVERTISEMENT APPEARED
PM

NUMBER OF TIMES ADVERTISEMENT APPEARED
One time

DATE(s) ADVERTISEMENT APPEARED
June 29, 1982

SPECIFICATIONS FOR ADVERTISEMENT

Place in legal classified ad section

COPY FOR ADVERTISEMENT

See Attached

AUTHORITY TO ADVERTISE		INSTRUMENT OF ASSIGNMENT	
NUMBER	56261NASX	NUMBER	
DATE	6-22-82	DATE	
SIGNATURE OF AUTHORIZING OFFICIAL	<i>Royl E. Jacobson</i>	TITLE	

INSTRUCTIONS TO PUBLISHERS

Extreme care should be exercised to insure that the specifications for advertising to be set other than solid be definite, clear, and specific since no allowance will be made for paragraphing or for display or leaded or prominent headings, unless specifically ordered, or for additional space required by the use of type other than that specified. Specifications for advertising other than solid and the advertisement copy submitted to the publisher will be attached to the voucher. The following is a sample of solid line advertisement set up in accordance with the usual Government requirements.

DEPARTMENT OF HIGHWAYS & TRAFFIC,
D.C. Bids are requested for first spring 1966 cement concrete repair contract, including incidental work, Washington, D.C., Invitation No. C-5576-H, consisting of 11,000 sq. yds. PCC Class BB sidewalk repair and 2,000 cu. yds. PCC Class A pavement, alley, & driveway repair, both cut repairs only. Bidding material available from the Procurement Officer, D.C. Sealed bids to be opened in the Procurement Office at 8:00 p.m., November 15, 1965.

Your bill for this advertising order should be submitted on the "Public Voucher for Advertising" form, which is printed on the reverse of this form, immediately after the last publication of the advertisement. If copies of the printed advertisement are not available, complete the affidavit provided on the voucher. Submit the voucher and a copy of the printed advertisement to

U.S. Environmental Protection Agency
Financial Operations Section
230 S. Dearborn
Chicago, Illinois 60604

IMPORTANT

Charges for advertising when a cut, matrix, stereotype or electrotype is furnished will be based on actual space used and no allowance will be made for shrinkage.

In no case shall the advertisement extend beyond the date and edition stated in this order.

ADVERTISING ORDER

ORDER NUMBER

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LESS DISCOUNT AT %	
BALANCE DUE	\$
VERIFIED (Initials)	

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TITLE

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Public comments concerning this application are requested by USEPA and will be accepted through July 31, 1982. Please send comments to:

U.S. Environmental Protection Agency
Region V
RCRA Activities
P.O. Box A3587
Chicago, Illinois 60690

JUN 25 1982

Mr. Michael Deller
City Librarian
Madison Heights Public Library
240 W. 13 Mile Road
Madison Heights, Michigan 48071

Dear Mr. Deller:

Per our telephone conversation on June 14, 1982, I am sending you a copy of the Sperry-Vickers Closure Plan and related background materials to be made available to the public at the Madison Heights Public Library for review and comment through July 31, 1982. I am enclosing an advance copy of the Public Notice advising the availability of these materials at the library that is scheduled to be published in the legal notice classified ad section of the Tribune, Royal Oak, Michigan on Tuesday, June 29, 1982.

Please return the materials in the enclosed self-addressed envelope following the close of the 30-day comment period on July 31, 1982.

Thank you very much for your cooperation in assisting our effort to serve the public.

Sincerely,

Dianne Rowland
Environmental Protection Specialist

Enclosures

D. ROWLAND; B. RUSSELL; 5HW-TUR:6-21-82

A.2 Interim Status



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V

111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

MAY 25 1982

Mr. Laurence Lowney
Sperry Vickers
32661 Edward
Madison Heights, Michigan 48071

RE: Interim Status Acknowledgement
FACILITY NAME: Sperry Vickers

USEPA ID No. MID083430348

Dear Mr. Lowney:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

OK
RJS
5-24-82

Enclosure
-cc: R.R. Thoren

Albert Sherman



ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

• MID083430348 REACKNOWLEDGEMENT

SPERRY VICKERS
32661 EDWARD
MADISON HEIGHTS MI 48071

INSTALLATION ADDRESS

32661 EDWARD
MADISON HEIGHTS MI 48093

ATTACH A

ATTACH A

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F 0 0 1	F 0 0 2				
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
7	8	9	10	11	12
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
19	20	21	22	23	24
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
25	26	27	28	29	30
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
37	38	39	40	41	42
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
43	44	45	46	47	48
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

<input checked="" type="checkbox"/> 1. IGNITABLE (D001)	<input type="checkbox"/> 2. CORROSIVE (D002)	<input type="checkbox"/> 3. REACTIVE (D003)	<input type="checkbox"/> 4. TOXIC (D000)
---	--	---	--

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

NAME & OFFICIAL TITLE (type or print)

DATE SIGNED

 Laurence Lowney
Facility Manager

8/18/80

EPA Form 8700-12 (5-80) REVERSE

We believe this information is correct to the best of our knowledge in accordance with our interpretation of the regulations at this time.

IX. DESCRIPTION OF HAZARDOUS WASTES

HAZARDOUS WASTES SCHEDULED FOR JUNE PROMULGATION

Hazardous waste from non-specific sources

EPA Hazardous Waste Number - F017

Paint residues generated from industrial painting

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: February 25, 1982

SUBJECT: Notification for
I.D. # M1D083430348

FROM: CSC *AB*

TO: File

The date stamped at the bottom of the notification is the date the mail was opened. The serial date stamp at the top indicates the date the form was processed. The postmark date, the official date received, is written in the column marked "Date Received".

FORM 1 GENERAL		ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION Consolidated Permits Program (Read the "General Instructions" before starting.)		I. EPA I.D. NUMBER M I D 0 8 3 4 3 0 3 4 8	
LABEL ITEMS				GENERAL INSTRUCTIONS	
I. EPA I.D. NUMBER		MID 083430348		If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.	
III. FACILITY NAME		SPERRY VICKERS			
V. FACILITY MAILING ADDRESS		32661 EDWARD			
VI. FACILITY LOCATION		MADISON HEIGHTS			
		PLEASE PLACE LABEL IN THIS SPACE			
		OUT OF BUSINESS			

II. POLLUTANT CHARACTERISTICS	
INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.	
SPECIFIC QUESTIONS	MARK 'X' FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)	YES NO FORM ATTACHED
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	YES NO FORM ATTACHED
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	YES NO FORM ATTACHED
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)	YES NO FORM ATTACHED
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)	YES NO FORM ATTACHED
B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)	YES NO FORM ATTACHED
D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)	YES NO FORM ATTACHED
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)	YES NO FORM ATTACHED
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)	YES NO FORM ATTACHED
J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)	YES NO FORM ATTACHED

III. NAME OF FACILITY	
1	SKIP SPERRY VICKERS

IV. FACILITY CONTACT	
A. NAME & TITLE (last, first, & title)	B. PHONE (area code & no.)
2	LOWNEY, LAURENCE FACILITY MGR. 313 280 3295

V. FACILITY MAILING ADDRESS			
A. STREET OR P.O. BOX	B. CITY OR TOWN	C. STATE	D. ZIP CODE
3	32661 EDWARD	MI	48071

VI. FACILITY LOCATION					
A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER	B. COUNTY NAME	C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
5	32661 EDWARD	OAKLAND	MI	48093	125

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST										B. SECOND										
C	7	3	4	9	4	(specify)					C	7	(specify)							
15	16	17	18	19	FLUID POWER VALVES & REGULATORS										15	16	17	18	19	
C. THIRD										D. FOURTH										
C	7	3	5	6	1	(specify)					C	7	(specify)							
15	16	17	18	19	FLUID POWER PUMPS & MOTORS										15	16	17	18	19	

VIII. OPERATOR INFORMATION

A. NAME																									B. Is the name listed in Item VIII-A also the owner?																
C	8	S	P	E	R	R	Y	C	O	R	P	O	R	A	T	I	O	N								<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO 66															
15	16																								55																
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)																				D. PHONE (area code & no.)																					
F = FEDERAL M = PUBLIC (other than federal or state) S = STATE O = OTHER (specify) P = PRIVATE																				P	(specify)									C	2	1	2	A	9	5	6	2	1	2	1
																				56										15	16	17	18	19	20	21	22	23	24	25	
E. STREET OR P.O. BOX																																									
12 90 AVENUE OF THE AMERICAS																																									
26																									55																
F. CITY OR TOWN																				G. STATE					H. ZIP CODE					IX. INDIAN LAND											
C	B	N	E	W	Y	O	R	K											N	Y	1	0	1	0	4	Is the facility located on Indian lands?															
15	16											40	41	42	43	44	45	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO 52																							

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)										D. PSD (Air Emissions from Proposed Sources)										
C	9	N	A							C	9	P	N	A						
15	16	17	18							15	16	17	18							
B. UIC (Underground Injection of Fluids)										E. OTHER (specify)										
C	9	U	N	A							C	9	N	A	(specify)					
15	16	17	18							15	16	17	18							
C. RCRA (Hazardous Wastes)										E. OTHER (specify)										
C	9	R	N	A							C	9	N	A	(specify)					
15	16	17	18							15	16	17	18							

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

F9 A/50

XII. NATURE OF BUSINESS (provide a brief description)

HYDRAULIC PUMP, MOTOR AND VALVE REPAIR, SALES AND SERVICE.

F9 A/51

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)		B. SIGNATURE	C. DATE SIGNED
R. R. THOREN		<i>R. R. Thoren</i>	Nov 14, 1980
V. P. GENERAL MGR., COMMERCIAL DIV.			

COMMENTS FOR OFFICIAL USE ONLY

C																								
15	16																							

FORM 3 RCRA		U.S. ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program (This information is required under Section 3005 of RCRA.)	I. EPA I.D. NUMBER											
			S M I D 0 8 3 4 3 0 3 4 8 3 1											

FOR OFFICIAL USE ONLY		COMMENTS
APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	
23	24 - 29	

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

☒ **1. EXISTING FACILITY** (See instructions for definition of "existing" facility. Complete item below.)

☐ **2. NEW FACILITY** (Complete item below.)

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

YR. MO. DAY
8 77 01 02

B. REVISED APPLICATION (place an "X" below and complete Item I above)

☐ **1. FACILITY HAS INTERIM STATUS**

☐ **2. FACILITY HAS A RCRA PERMIT**

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY
Disposal:					
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S	DUP												T/A	C
C													3	1
1	2											13	14	15
LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY					
		1. AMOUNT (specify)	2. UNIT OF MEAS- URE (enter code)				1. AMOUNT	2. UNIT OF MEAS- URE (enter code)						
X-1	S 0 2	600	G		5									
X-2	T 0 3	20	E		6									
1	S 0 1	1,320	G		7									
2					8									
3					9									
4					10									
16	18	19	27	28	29	30	31	32						

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE
POUNDS.....	P
TONS.....	T

METRIC UNIT OF MEASURE	CODE
KILOGRAMS.....	K
METRIC TONS.....	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

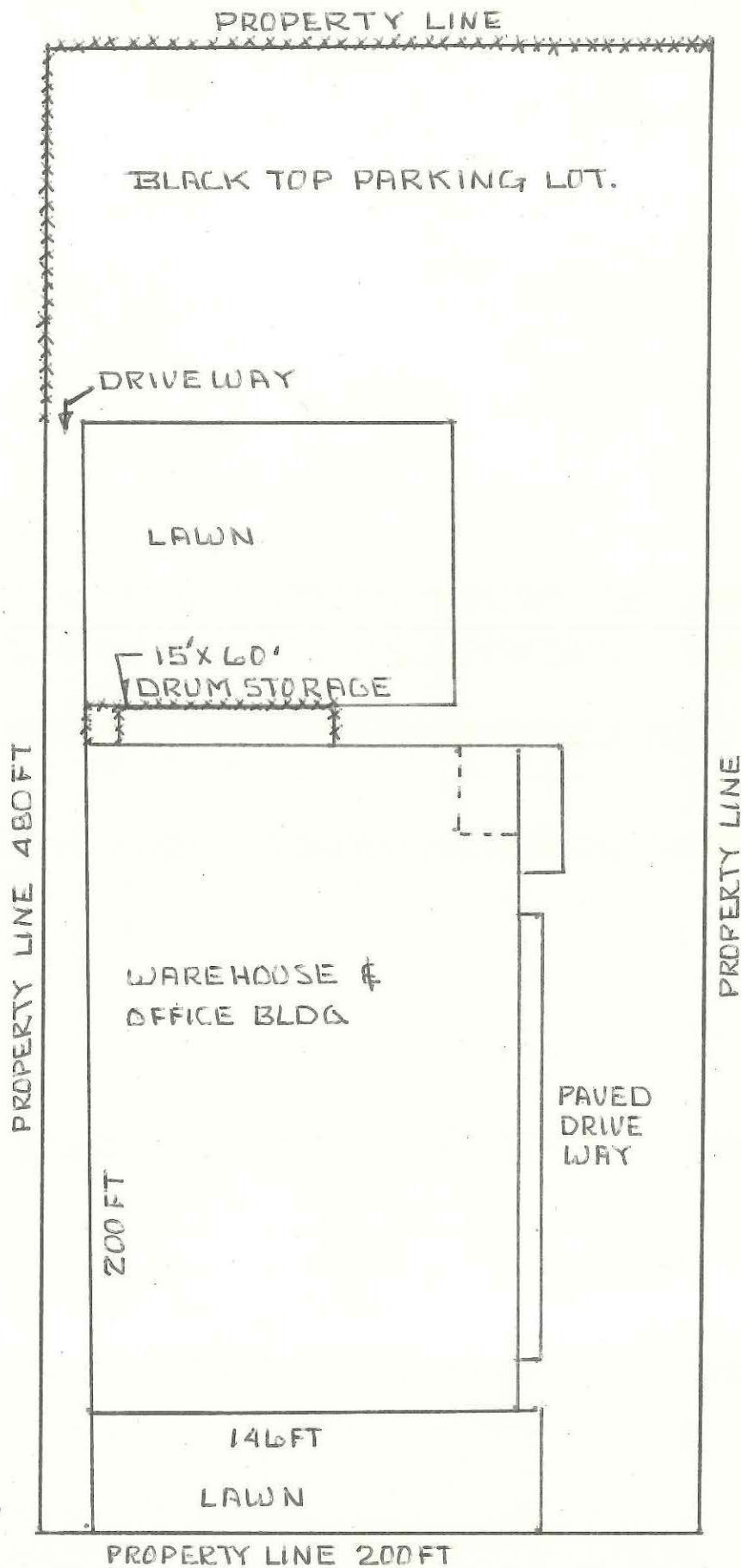
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY												
<div style="display: flex; justify-content: space-between;"> WM I D 0 8 3 4 3 0 1 3 4 8 3 1 T/A C 3 1 </div>													<div style="display: flex; justify-content: space-between;"> W 1 2 DUP T/A C 3 2 DUP </div>												

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEAS- URE (enter code)	D. PROCESSES												
				1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (if a code is not entered in D(1))								
				27	28	29	27	28	29	27	28	29	27	28	29	
1	F 0 0 1	17,000 lbs	P	S	0	1										
2	F 0 0 2															Included with F001
3	U 2 2 8															Included with F001
4	D 0 0 1	17,012 lbs	P	S	0	1										
5	U 2 2 0															Included with D001
6	D 0 0 2	5000 lbs	P	S	0	1										
7																
8																
9																
10																
11																
12																
13																
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15																
16																
17																
18																
19																
20																
21																
22																
23																
24																
25																
26																

V. FACILITY DRAWING (see page 4)



2" = 100 FT.
10-21-80

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY												
W M I D 08 3 43 0 34 8 3 1													W DUP 2 DUP												
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)																									
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES																					
				1. PROCESS CODES (enter)																					
				2. PROCESS DESCRIPTION (if a code is not entered in D(1))																					
1	F 0 01	17,000 qqq	P S 0 1																						
2	U 2 28			INCLUDED WITH LINE NO. 1																					
3	F 0 17	12 qqq	P S 0 1																						
4	D 0 01	17,000 qqq	P S 0 1																						
5	D 0 02	5,000 qqq	P S 0 1																						
6																									
7																									
8																									
9																									
10																									
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25																									
26																									

See Amendment

IV. DESCRIPTION OF HAZARDOUS WASTE (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

S	M	I	D	0	8	3	4	3	0	3	4	8	3	6
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

F6 A/55

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

F6 B/56

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

4	2	3	1	3	0	0
55	56	57	58	59	60	71

LONGITUDE (degrees, minutes, & seconds)

8	3	0	6	3	0	0
72	73	74	75	76	77	78

VIII. FACILITY OWNER

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

E	SHERMAN S INDUSTRIAL VILLAGE
15	16

3	13	58	8	43	5	0
55	56	57	58	59	60	61

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

F	1000 EAST MANDOLINE
15	16

G	MADISON HEIGHTS
45	46

M	I	4	8	0	7	1
40	41	42	43	44	45	46

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

SHERMANS INDUSTRIAL VILLAGE
ALBERT SHERMAN

B. SIGNATURE



C. DATE SIGNED

11/13-80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

R.R. THOREN
V.P. GENERAL MGR. COMMERCIAL
DIV.

B. SIGNATURE



C. DATE SIGNED

11/14/80





A.4 Closure

Closed

5HW-TUB

AUG 30 1982

Mr. Lawrence Lowney
Facility Manager
Sperry Vickers
32661 Edward
Madison Heights, Michigan 48071

RE: Closure Plan
MID083430348

Dear Mr. Lowney:

On June 2, 1981, you submitted to the United States Environmental Protection Agency the closure plan for your facility located at 32661 Edward, Madison Heights, Michigan. The plan calls for the removal of ignitable waste, corrosive waste, and spent halogenated solvents stored in 55 gallon drums. A 30-day public comment period on this plan ended on July 31, 1982. No comments were received regarding the closure of this facility.

The closure plan is hereby approved. Please submit the certifications required by 40 CFR § 265.115.

Please contact Mr. Joseph M. Boyle of my staff, at (312) 886-3754, if you have any further questions on this matter.

Sincerely,

Basil G. Constantelos, Director
Waste Management Division

cc: Mr. Alan Howard, MDNR

J.Boyle:rita:5HW-TUB:8-7444:8/4/82

JNB 8/4/82

Rita Williams 8-30-82
JLW 8/4/82
KJK 8/5/82

DB 8/5/82
8/4/82
WAW 8/4/82
JS 8/27
8/27

U.S. ENVIRONMENTAL PROTECTION AGENCY

Date: June 18, 1982
To: Part A Files
From: Dianne Rowland *DR*
Re: Sperry+Vickers Closure Plan

The enclosed advance copy of a Public Notice concerning a closure plan by Sperry+Vickers is scheduled to be published on June 29, 1982, in the afternoon edition of the Tribune, Royal Oak, Michigan, a daily newspaper.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: August 2, 1982
SUBJECT: Sperry+Vickers Closure Plan
MID083430348
FROM: Barbara Russell *BR*
RAIU
TO: Joe Boyle
STU #1

This memorandum is to inform you that the public comment period for the closure of Sperry+Vickers hazardous waste storage facility ended on July 31, 1982. No public comments were received in regard to the closure of the above subject facility located at 32661 Edward Avenue, Madison Heights, Michigan.



XXXXXXXXXX
XXXXXXXXXX
XXXXXXXXXX

32661 Edward Avenue
Madison Heights, MI 48071

June 2, 1982

g, T, TSD, PA

RCRA Activities
EPA Region V
Chicago, ILL 60690

Gentlemen,

Please find attached the closure plan for our facility, located at 32661 Edward Avenue, Madison Heights, MI 48071.

This plan is submitted for your approval and covers the closure that is planned for September 1, 1982.

Sincerely,

Lawrence M. Lowney
Lawrence M. Lowney
Warehouse and Facility Manager

.n

attachment

RECEIVED

JUN 15 1982

WASTE MANAGEMENT BRANCH
EPA REGION V

RECEIVED
6/04/82

MY TELEPHONE NUMBER IS (313) 280 3295

CLOSURE PLAN

E.P.A. I.D. No. MID 083430348 *gmb*
Sperry+Vickers
32661 Edward Avenue
Madison Heights, Mi. 48071
Phone Number (313) 280-3295

General Information

The Sperry+Vickers, Madison Heights facility is 32,000 sq. ft. that is divided into four (4) departments. They are (1) Warehouse, (2) Unit Repair, (3) Assembly/Test and (4) Sales. Chemicals are used and hazardous waste generated in the Unit Repair and Assembly and Test departments only.

I. Facility Closure

- A. The Sperry+Vickers, Madison Heights facility will be completely closed by September 1, 1982. The closure performance standard, part 265.111, will be met by complete removal of all hazardous waste.
- B. The following is a list of the maximum hazardous waste at this location.

<u>EPA Hazardous Waste No.</u>	<u>Description</u>	<u>Total Gallons</u>
F001	Spent Halogenated Solvents	80
D001	Cleaning Solvent Flammable	90
D002	Corrosive	525

- C. All hazardous waste is stored in 55 gallon drums and placed in a secured storage pad with containment curbing.
- D. It is anticipated that no equipment or structures will be contaminated. However, in the event that they are, they will be decontaminated by removing all hazardous waste and residues.
- E. Following is the schedule for closure.
 - 1. Facility will be operational until mid-July at which time the processes will be shut down.
 - 2. All manufacturing processes (equipment not subject to closure) will be drained of contents and placed in 55 gallon drums. This will be accomplished by August 1st.

3. By august 15th., all waste will be removed from facility and ready for inspection by a registered professional engineer.

F. When closure is completed, certification by Sperry+Vickers and an independent registered professional engineer will be submitted to the Regional Administrator that the facility has been closed in accordance with all specifications in the approved closure plan.



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V

111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
5HW-TUB

Mr. Lawrence Lowney
Facility Manager
Sperry Vickers
32661 Edward
Madison Heights, Michigan 48071

RE: Closure Plan
MID083430348


Dear Mr. Lowney:

On June 2, 1981, you submitted to the United States Environmental Protection Agency the closure plan for your facility located at 32661 Edward, Madison Heights, Michigan. The plan calls for the removal of ignitable waste, corrosive waste, and spent halogenated solvents stored in 55 gallon drums. A 30-day public comment period on this plan ended on July 31, 1982. No comments were received regarding the closure of this facility.

The closure plan is hereby approved. Please submit the certifications required by 40 CFR § 265.115.

Please contact Mr. Joseph M. Boyle of my staff, at (312) 886-3754, if you have any further questions on this matter.

Sincerely,


Basil R. Constantelos, Director
Waste Management Division

cc: Mr. Alan Howard, MDNR

CLOSURE PLAN

E.P.A. I.D. No. MID 083430348
Sperry+Vickers
32661 Edward Avenue
Madison Heights, Mi. 48071
Phone Number (313) 280-3295

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The Sperry+Vickers, Madison Heights facility is 32,000 sq. ft. that is divided into four (4) departments. They are (1) Warehouse, (2) Unit Repair, (3) Assembly/Test and (4) Sales. Chemicals are used and hazardous waste generated in the Unit Repair and Assembly and Test departments only.

I. Facility Closure

- A. The Sperry+Vickers, Madison Heights facility will be completely closed by September 1, 1982. The closure performance standard, part 265.111, will be met by complete removal of all hazardous waste.
- B. The following is a list of the maximum hazardous waste at this location.

<u>EPA Hazardous Waste No.</u>	<u>Description</u>	<u>Total Gallons</u>
F001	Spent Halogenated Solvents	80
D001	Cleaning Solvent Flammable	90
D002	Corrosive	525

- C. All hazardous waste is stored in 55 gallon drums and placed in a secured storage pad with containment curbing.
- D. It is anticipated that no equipment or structures will be contaminated. However, in the event that they are, they will be decontaminated by removing all hazardous waste and residues.
- E. Following is the schedule for closure.
 - 1. Facility will be operational until mid-July at which time the processes will be shut down.
 - 2. All manufacturing processes (equipment not subject to closure) will be drained of contents and placed in 55 gallon drums. This will be accomplished by August 1st.

3. By august 15th., all waste will be removed from facility and ready for inspection by a registered professional engineer.
-
- F. When closure is completed, certification by Sperry+Vickers and an independent registered professional engineer will be submitted to the Regional Administrator that the facility has been closed in accordance with all specifications in the approved closure plan.

VICKERS

XXXXXXXXXX
XXXXXXXXXX
XXXXXXXXXX

32661 Edward Avenue
Madison Heights, MI 48071

June 2, 1982

RCRA Activities
EPA Region V
Chicago, ILL 60690

Gentlemen,

Please find attached the closure plan for our facility, located at 32661 Edward Avenue, Madison Heights, MI 48071.

This plan is submitted for your approval and covers the closure that is planned for September 1, 1982.

Sincerely,

Lawrence M. Lowney
Lawrence M. Lowney
Warehouse and Facility Manager

.n

attachment

MY TELEPHONE NUMBER IS (313) 280 3295

Clayton Environmental Consultants, Inc.

25711 Southfield Road, Southfield, Michigan 48075, Telephone 313 424-8860

CLOSURE CERTIFICATION

EPA I.D. No. MID083430348 G, T, TSD, PA

RECEIVED

SPERRY VICKERS
32661 Edwards Avenue
Madison Heights, MI 48071

OCT 04 1982

WASTE MANAGEMENT BRANCH
EPA, REGION V

DESCRIPTION:

The site formerly contained a manufacturing facility utilizing various cleaning solvents, corrosive caustics, and oils (hydraulic). A covered area secured by fencing was located in the rear of the manufacturing plant building and used for temporary storage of drum wastes. Sperry Vickers submitted a closure plan in accordance with applicable regulations to the U.S. Environmental Protection Agency Region V office in Chicago, Illinois, on June 2, 1981. A 30-day public comment period was allowed by the EPA, and no public comments were received relative to the closure of the facility. The plan was approved by U.S. EPA subject to the requirements of 40 CFR Section 265.115.

SITE CONDITIONS:

The site inspection to determine compliance with the closure plan was performed September 22, 1982, at the request of the Sperry Vickers Corporation. The inspection was performed by Mr. Kenneth F. Cherry, P.E. and Sperry Vickers was represented during the inspection by Mr. Lawrence W. Lowney. The interior of the building was examined, and it was found that there were no hazardous wastes stored in the building. All operating equipment had been removed, and Mr. Lowney indicated the equipment was presently at other Sperry sites which have assumed the functions of this facility since cessation of operations. It should be noted that the relocation of operations were due to general business conditions and not related to the hazardous materials stored onsite. Upon examination of the building, it was noted that the floor had been well cleaned and any residue from operations left, was removed.

RECEIVED
10/06/82

The drum storage area behind the building was noted to be a concrete pad with curbing and a roof was provided over the area which was enclosed by a security fence. The concrete area, on which drums were stored, was examined and no residue was noted. Mr. Lowney stated that the disposal crew had washed down the facility and collected all washwater and promptly disposed of it. The natural run-off direction from the storage area empties into a small, grassy area along a drive next to the building. The area was examined, and there was no evidence of contamination. The vegetation in the area appeared normal with no discoloration or stunting of growth.

Upon completion of the site inspection, the Sperry Vickers records were examined, and it was noted that all manifests for shipping of the wastes appeared to be in order and in compliance with the regulations. The closure plan noted that halogenated solvents, cleaning solvents, and corrosives were onsite, and the manifests were for these materials plus oils. Upon questioning the Sperry Vickers representative, it was learned that a small quantity of hydraulic oil (non-PCB) remained on the facility, and was manifested and disposed in accordance with applicable regulations.

CONCLUSION:

The site visit and review of company files indicates that the closure has been done in accordance with good engineering practice and in compliance with the EPA approved facility closure plan. The inspection of the facility and review of the documents indicates no apparent continuing environmental risk exists at this facility as of September 22, 1982.

CERTIFICATION:

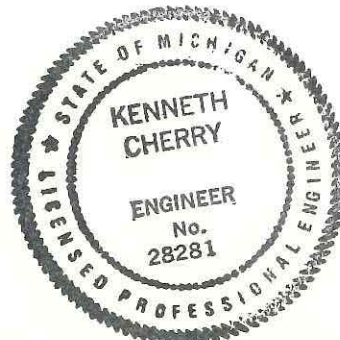
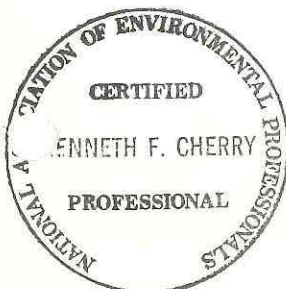
I, Kenneth F. Cherry, certify that I performed the above inspection, and all statements are true to the best of my knowledge. I further certify that the inspection and review of documents show the facility to have been closed in accordance with the closure plan MID083430348.

Submitted,


Kenneth F. Cherry, P.E., C.E.P.

KFC/mhl
Attachment (Closure Plan)

cc: Alan Howard (MDNR)
Basil Constantelos (U.S. EPA)





1401 CROOKS ROAD
TROY, MICHIGAN 48064-7157

October 1, 1982

RCRA Activities
EPA Region
Chicago, Illinois 60690

SUBJECT: Closure Certification PT A
EPA I.D. No. MID083430348 801117 GEN TRANS TSD

Gentlemen,

By copy of this memo Sperry Vickers certifies that it has closed its facility located at 32661 Edward Avenue, Madison Heights, Michigan according to our approved facility closure plan dated June 2, 1982.

Closure was completed on September 22, 1982 with the on site inspection made by the Clayton Environmental Consultants of Southfield, Michigan. A copy of their report is attached.

Sincerely,

Laurence M. Lowney
Laurence M. Lowney,
WAREHOUSE & FACILITY
MANAGER

LL/rc

cc: Mr. Alan Howard, MDNR

WASTE MANAGEMENT BRANCH
EPA REGION V
OCT 07 1982
RECEIVED

3527

MY TELEPHONE NUMBER IS (313) 280 _____

RECEIVED
10/08/82

**B. Permit Application
/Post Permit**

PRINTING INK DIVISION
DIVISION OF BORDEN CHEMICAL, BORDEN INC



September 10, 1982

OHDO68932011 G,T,TSD PA

Mr. Thomas E. Crepeau, Manager
Permits & Manifest Records Section
Division of Hazardous Materials Management
Ohio EPA
361 E. Broad Street
Columbus, Ohio 43216-1049

Dear Mr. Crepeau:

Per your letter of August 10, 1982, attached is a copy of
our Hazardous Waste Management Facility Contingency Plan.

If there are any questions, please contact me at the phone
number below.

Very truly yours,

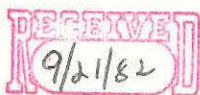
BORDEN CHEMICAL

FR/nd

F. Rosenbloom
Manager of Engineering

FR:nd

cc: U.S. EPA
Region V
111 West Jackson Boulevard
Chicago, Illinois 60604



RECEIVED

SEP 15 1982

WASTE MANAGEMENT BRANCH
EPA, REGION V

BORDEN GRAPHICS DIVISION - WOODLAWN PLANT

HAZARDOUS WASTE MANAGEMENT FACILITY
CONTINGENCY PLAN

This contingency plan is presented in compliance with 40CFR265. It contains nine (9) parts with addendum.

1. General Information
2. Emergency Coordinators
3. Emergency Response Procedures
4. Coordination Agreements
5. Emergency Actions and Procedures
6. Emergency Equipment
7. Evacuation Plan
8. Spill Prevention & Control
9. Required Reports

1. General Information

- Name: Borden Graphics Division - Woodlawn
- Location: 630 Glendale-Milford Road
Cincinnati, Ohio 45215
- Operator: Borden Inc.
180 E. Broad Street
Columbus, Ohio 43215
- Emergency Coordinator: Dr. Peter Semadeni
Nonresponsive
Home Telephone No.: **Nonresponsive**
Office Telephone No.: 513-782-6330
- Type of Facility: Printing ink and pigment manufacturing plant.
- Facility Site Plan: See attached site plan and area map.
- Description of Site Activities: We service the printing industries and coating specialties. At the Woodlawn plant, printing inks and pigments are processed. The resulting waste streams include solvent bearing ink sludge [(K-086) & (D-001)], water bearing ink sludge and tub wash that is classified K-086 as well.

From our pigment manufacturing operation, there are surface impoundment areas to settle our organic and inorganic acid waste, pigment solids, insoluble salts, and other compounds. The final effluent stream is neutralized and discharged to the Metropolitan Sewer District. The sludge is classified as F-002, F-003, F-005, K-002, K-003 & K-007. An attached flow sheet shows the effluent and surface impoundment system.

We have a hazardous waste storage area on the west side of the property. Drums of waste are stored in the area as well as two above ground storage tanks for flammable solvent fuel supplement. The wastes are segregated into three categories.

2. Emergency Coordinators

● Principal:

Dr. Peter Semadeni

Nonresponsive

Home Telephone No.: **Nonresponsive**

Office Telephone No.: 513-782-6330

● Alternates:

Mr. Fred Rosenbloom

Nonresponsive

Home Telephone No.: **Nonresponsive**

Office Telephone No.: 513-782-6282

Mr. Richard Blizzard

Nonresponsive

Home Telephone No.: **Nonresponsive**

Office Telephone No.: 513-782-6285

- Emergency Coordinator - Dr. Peter Semadeni is General Manager - Specialty Products Group and is familiar with all the technical and administrative aspects of our waste handling process. He has the responsibility and authority to implement the emergency plan including plant shutdown and evacuation, if required.
- The emergency coordinators can delegate and deputize other employees to assist in the event of an emergency.
- The emergency coordinator serves as "Director" of the Borden Emergency Response Team (BERT) that is available at each operating shift. The team is a well trained emergency squad and have periodic training exercises for emergency situations such as chemical spills, fires, explosions, storms, and floods.
- It is the responsibility of the emergency coordinator to report an incident to federal, state and local authorities (following emergency containment and/or control). He will also decide the type and extent of outside assistance required to respond to the emergency effectively. His main concern will be threat to human life, health and the environment.

3. Emergency Response Procedure

● Notification

- Any employee discovering a fire or hazardous release that is not readily controllable with equipment and materials at hand must activate the emergency alarm system and contact the BERT Team, emergency coordinator and the Woodlawn Fire Department.

- All employees hearing the alarm must close down and secure their equipment and proceed immediately to the administration building to await further instructions from the emergency coordinator.
- The emergency coordinator will assess the situation and notify the appropriate parties identified in Section 4.
- The emergency coordinator will call Operation Alert, (614) 457-5200, the National Response Center, (800) 424-8802, and the Ohio EPA Emergency Response, (614) 466-6542, and report the incident. The report will include the following:
 - * name and telephone number of the reporter
 - * name and address of this facility
 - * time and type of incident (e.g., spill occurred at 3:30 pm)
 - * identification and quantity of materials involved (e.g., 50 gallons of waste solvent in tank area)
 - * The extent of injuries (e.g., no injuries)
 - * the possible hazards to the environment and human health outside the facility (e.g., possible contamination of ground water)
- The emergency coordinator or one of his deputies will conduct a roll call for all employees who have signed in to determine whether any employees are trapped in the affected area.

4. Coordinator Agreement

- Copies of the contingency plan have been submitted to:
 - The Woodlawn Police Chief, John Williams, 10141-43 Woodlawn Blvd., Cincinnati, Ohio 45215, office phone number 513-771-8480, emergency phone number 513-825-2280.
 - Woodlawn Fire Chief, Ken Frankl, 10141-43 Woodlawn Blvd., Cincinnati, Ohio 45241, office phone 513-771-0233, emergency phone 513-825-2260.
 - Woodlawn Life Squad Chief, Ken Frankl, 10141-43 Woodlawn Blvd., Cincinnati, Ohio 45215, office phone 513-771-0233, emergency phone 513-825-2280.
 - Bethesda North Hospital, Mr. Michael Turner, Vice President and Manager, 10500 Montbomery Road, Cincinnati, Ohio 45242, phone number 513-559-6000.
 - Contractor (heavy equipment for clean-up), The Trend Construction Co., Mr. Robert Henderson, President, address 11148 Woodward Lane, Cincinnati, 45241, phone number 513-772-1521.
- Local fire, police departments have been familiarized with the plant layout, location of hazards, access routes, evacuation plan, and properties of materials and waste handled in the past.
- Local and state emergency response authorities have visited the plant and reviewed our operation.

5. Emergency Action & Procedures

- Responsive Action: Our Woodlawn facility has a Borden Emergency Response Team that is trained to meet the requirements for certification by the American Red Cross in First Aid and CPR and in fire fighting to meet the requirements for certification as an industrial fire brigade in the State of Ohio. They are also trained in spills containment. Our BERT team and truck will be dispatched to the emergency scene.

- Alarms: A fully automated audible fire alarm system is interlocked with ADT Alarm System for the entire alarm system. Manual pull alarm boxes are strategically located throughout the complex. A full paging system is also available.

Personnel are trained to activate the alarm and decipher the building and emergency codes.

- In event of fire, automatic activation of the alarm signals Woodlawn Fire & Police Departments through ADT.
- In event of a spill, emergency coordinator or his designate is alerted and depending upon severity decides which emergency service authorities should be contacted.

- Containment and Control:

- The emergency coordinator will take all necessary measures to contain the hazard within the plant and to prevent its spread to other nearby facilities, with the assistance of emergency personnel assigned by the various parties contacted.
- In case of a spill, absorbent material will be placed on the spill. The small bulldozer will be used for scraping the contaminated soil, which will be considered to be hazardous waste unless analysis shows otherwise.
- The emergency coordinator will employ one or more of the following measures to ensure maximum protection of the safety and health of employees and nearby residents: use of appropriate protection equipment, dismiss all nonessential personnel, and advise the Mayor of Woodlawn of the desirability of evacuating certain sections of the village.
- All personnel, including management, supervision, and hourly, are familiar with hazardous materials used. Ample supplies of materials for containment of spills are stocked strategically. Spills of acids will be neutralized under supervision with caustics. Spills of caustics will be neutralized under supervisions with acids. Spills outside diked areas will be contained by earth, sand or absorbents or diverted to containment areas as appropriate. At the south side of this property is a 30,000 gallon containment vault below ground level. Street drains, the septic sewer and outfall 001 can be diverted to this vault.

- Follow-up Actions

- Following containment and control of the emergency, the emergency coordinator will provide for collection, treatment, and disposal of the waste and contaminated soil, water, or other materials by the emergency crew or outside contractor, as appropriate.

- The emergency coordinator will ensure that all emergency equipment is restored to full operational status by the emergency crew.
- The emergency coordinator, assisted by two other qualified persons, will investigate the cause of the emergency and will take steps to prevent a recurrence of such or similar incidents.
- The emergency coordinator will make sure that the cause of the emergency has been eliminated and that clean-up and restoration have progressed at least to the point of not jeopardizing the health and safety of the employees, and that EPA, state, and local authorities have been notified, before permitting resumption of the operations affected by the emergency.

6. Emergency Equipment

- Each working area is equipped with a chemical fire extinguisher, a supply of spill absorbing material, and a shower and eye fountain to wash off personal spills.
- A small bulldozer is available for maintaining the waste pond and for removing soil contaminated by a hazardous waste spill.
- The telephone numbers of the principal and alternate emergency coordinators, the Woodlawn Fire and Police Departments and the ambulance unit at the Bethesda North Hospital, are displayed prominently near all the telephones shown on the site diagram.
- Sprinkler System - all buildings except the following:
 - Bldg. 1 & 1A
 - Bldg. 10
 - Bldg. 12
 - Bldg. 13
- Fire Extinguishers - All Buildings
Size from 5 lb. ABC to 100# ABC & CO₂ strategically located and identified.
List follows:

- Bldg. 1	18 extinguishers
- Bldg. 2	21 extinguishers
- Bldg. 3	21 extinguishers
- Bldg. 4	18 extinguishers
- Bldg. 5	19 extinguishers
- Bldg. 6	6 extinguishers
- Bldg. 7	1 extinguisher
- Bldg. 8	13 extinguishers
	5 dry chemical wheel tanks
- Bldg. 9	43 extinguishers
- Bldg. 10	2 extinguishers
- Bldg. 11	5 extinguishers
- Bldg. 12	3 extinguishers
- Bldg. 13	3 extinguishers
- Drum Storage Area	3 extinguishers
	1 dry chemical self-actuating deluge

● Other Emergency Equipment -

- Bldg. 8
 - * 2 Scott Air Packs
- Bldg. 9
 - * 2 Scott Air Packs
 - * Personnel protective suits.
- Yard
 - * Bobcat with front end loader.
 - * Rough terrain fork truck.
 - * Emergency response vehicle that includes fire fighting equipment, as well as first aid.
 - * We maintain stocks of sawdust, clay earth material, oil absorbent pads and material. We can neutralize acid and alkaline spills with drummed reactants.
- The storage shed contains a large supply of absorbent material, shovels, and other clean-up equipment.
- The administration building houses a small first aid station.

7. Evacuation Plan

- Facility personnel will be evacuated if the emergency coordinator decides that their personal safety is in danger.
- Alarm will be sounded and an announcement over the loudspeaker system will be made by the emergency coordinator or his designate to evacuate plant.
- Foreman, supervisor, or delegate will follow sections shutdown procedure. He will then remove time cards from rack before leaving building and account for all employees at point of assembly.
- Assembly Areas
 - Administrative Bldg. #1 - East Parking Lot.
Use nearest exit door and assemble in East Parking Lot - Southeast Corner.
 - Shipping, Bldg. 2 - Northeast Field
 - Maintenance, Bldg. 6 - Northeast Field
 - Roto Dept., Bldg. 4 - Northeast Corner - Driveway
 - Chip, Bldg. 5 - Northeast Corner - Driveway
 - Letterpress, Bldg. 3 - Southeast Field
 - Varnish, Bldg. 8 - West Field behind Varnish Plant
 - Color, Bldg. 9 - West Field behind Varnish Plant
 - Haz. Waste Storage - To Gate E

- Supervisors will take roll call. No one is to leave safe area without permission from supervisor.
- If evacuation is required from safe assembly areas, supervisors will lead the groups through the following gates.
 - East Parking Lot - to Taconic Terrace
 - Northeast Field - Gate C to Taconic Terrace
 - Northeast Driveway - Gate C to Taconic Terrace
 - Southeast Field - Gate B to Taconic Rd.
 - West Field - Gate A to Rt. 126
 - Hazardous Waste Storage - Gate E to Rt. 126

8. Spill Prevention Control

● Identification of Areas of Potential Spills

- Diked Areas and Below Ground Tanks.

* Solvent Tank Farm A

This tank farm is located at the northeast section of the property. It contains 4,000 gallon, 5,000 gallon and 10,000 gallon bulk storage tanks above ground. They contain red label organic solvents: Toluene, VMP, Ethyl Alcohol, Isopropyl Alcohol, Hexane, Ethyl Acetate and Isopropyl Acetate.

* Ink Tank Farm B

This area contains twelve (12) 6,000 gallon tanks below ground level between buildings #4 and #5 in the northeast section of the property. These tanks contain finished low flash point inks. They are constantly monitored for the volumes of ink manufactured and stored. Volume shortages would be detected indicating possible leaks by this daily inventory monitoring.

* Pigment North Tank Farm C

This area is located on the north side of Building #9. There are six (6) above ground tanks ranging in capacity from 4,000 to 20,000 gallons, individually diked:

Tank #1 - Nitric acid -- 8,000 gallons

Tank #2 - Sulfuric Acid -- 4,000 gallons

Tank #3 - Sodium Bichromate Solution -- 6,000 gallons

Tank #4 - Hydrochloric Acid -- 4,000 gallons

Tank #5 - Aluminum Chloride Solution -- 10,000 gallons

Tank #6 - Sodium Bichromate Solution -- 20,000 gallons

* South Pigment Tank Farm D

This area is located southeast of Building #9. There are eleven (11) above ground tanks ranging in capacity from 2,000 gallons to 6,000 gallons, individually diked.

Tanks #2, #5, #6 and #7 contain Ehtanol.

Tank #1 contains Sulfuric Acid.

Tank #3 contains Hydrochloric Acid

Tank #4 holds Sodium Hydroxide.

Tanks #8, #9, #10 and #11 hold solutions of resin and textile spirit solvent.

Oleum tank is in a wood building west of this area. It is also fully diked.

* Varnish Tank Farm E

This area is located approximately in the geographical center of the facility. It is fully diked and contains thirteen (13) 25,000 gallon and six (6) 15,000 gallon tanks. They contain materials consisting of kersinic type organic liquids, vegetable oils, resin solutions and finished oleoresinous varnishes.

The rain water in this area flows to a sump equipped with an oil separator. The cleaned water is discharged to the surface drainage. This oil separator was installed with the approval of the Ohio EPA.

* Bromine Storage Tank

The bromine storage tank is located on the south side of Building #9 enclosed by a wooden structure. Its capacity is 10,000 gallons. In the event of a bromine spill in the air, ammonia gas will be used to neutralize it yielding ammonium bromide. This is an innocuous substance. The bromine tank area is fully diked and contingency plans call for spreading on a thin layer of water to contain the bromine vapors and then neutralizing, under supervision, with materials such as potash or soda ash. In no case will sodium hydroxide be used.

* Heating Oil

There are actually two (2) 10,000 gallon #2 oil tanks underground in two (2) separate locations. One is at the northeast corner of Building #5. The second one is at the southwest corner of Building #7. These tanks are inventoried every spring.

* Tub Washer Holding Tank

There is an underground holding tank with the capacity of 800 gallons for the tub washer in Building 2-3. This tank receives the caustic wash solution from tubs cleaned that contained oleoresinous inks.

- Non-Diked Areas

Spills from the following bulk storage areas and loading/unloading areas will drain into trenches which lead to a 30,000 gallon vault below ground level. This vault is located 50 feet north of our security guard station on the south side of the property.

* Unloading Deliveries at Solvent Tank Farm A

This area is adjacent to the dike. Should a spill occur, it would be contained with absorbent clay/sand.

* Loading Inks From Ink Tank Farm B

This area is west of the tank farm. Ink is filtered in the shelter house prior to filling the ink wagon. Spilled product would be treated with absorbent clay/sand.

* Unloading to Pigments North Tank Farm C

Small spills would be treated with absorbent clay/sand. Large spills will be diverted to the 30,000 gallon vault.

* Unloading Deliveries at Pigments South Tank Farm D at Railroad Siding

Any spilled material would be treated with absorbent clay/sand or if it is a large spill, it would be captured in the 30,000 gallon vault.

* Varnish Tank Farm E. Railroad Siding

The maximum of 20,000 gallons of oils are unloaded at this siding. As previously discussed, this area would contain strategically located trenches to divert the spill through the 30,000 gallon vault.

* Varnish Boiler House Building #7

This area contains Therminol, which is a heat exchange oil. At present, an absorbent clay is kept on hand for emergencies. All leaks and spills will be treated with this clay. Should the spill be large, nearby trenches will divert it to the 30,000 gallon vault.

* Building #8 - Varnish

This area contains a maximum of 4,500 gallons of glycerin, 4,500 gallons of tung oil, and 4,200 gallons of a kerosinic type organic solvent. Should a spill occur, it would flow out of the building and onto surface drainage. Trenches would divert the spill to the 30,000 gallon vault.

* Effluent Neutralization Station

There is an above ground 1,500 gallon capacity tank for sodium hydroxide solution and a 150 gallon tank for sulfuric acid. This material is used to neutralize effluent from Pond #3 before sending it to the Metropolitan District. The area surrounding these tanks is filled in with limestone. Should an acid spill occur, the limestone will neutralize the acid. Should the spill be large, extra lime or soda ash will be used.

- Hazardous Waste Storage Area

This area is located on the southwest portion of the Borden property. It is west of Buildings #7 and #8 and south of settling pond #2. This storage area is approximately 150 feet x 300 feet. It is designed to handle a maximum of 4,000 fifty-five gallon drums stacked two (2) high. Hazardous wastes are segregated by physical state and by their hazard.

Waste is also stored in two (2) 6,000 gallon bulk tanks above ground. These tanks have earthen dikes.

Our extinguishing equipment is immediately available to this area. They include a hose house and hydrant as well as many portable extinguishers. A telephone with facility paging capabilities is also nearby. The area is posted as required with "No Smoking" signs and "No Trespassing" signs. The area is well lit and secured with fencing. The area is inspected on a daily basis by environmental personnel and our security guards.

● Specific Instructions for Spills of Various Sizes

- Small spills - under 50 gal.

- * Contain spill to confined area.
- * If spill is on impervious membrane, limit spill area with sawdust, clay, oil absorbent or similar material.
- * Use suitable container for receptacle of spilled waste material.
- * Clean-up spill area and, if possible, decontaminate.
- * If spill is on ground, remove sufficient amount of soil to remove as much waste as possible.
- * Emergency coordinator to provide for disposal.

- Large Spills

- * Limit and confine spill area.
- * Divert material to existing trenches that will eventually lead to diversion pond.
- * Create trench to selected area to pool and confine spill.
- * Remove spilled material into suitable containers with existing "bobcat" tractor.
- * Decontaminate and dispose as above.

● Specific Instructions for Fire & Explosion

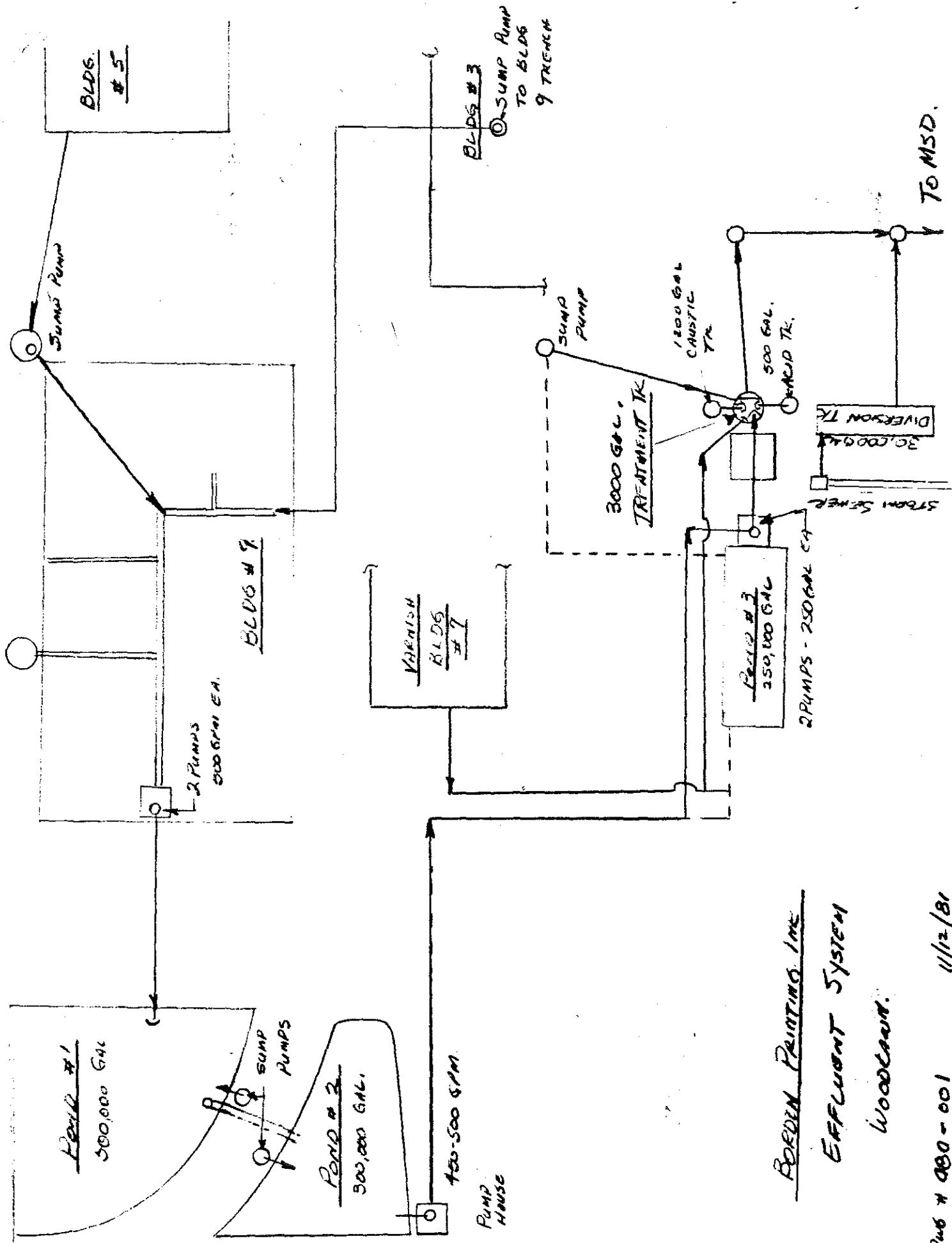
- In the event of fire and explosion, initial response will be to alert Woodlawn Fire Department via the following systems.
 - * ADT will respond on pressure drop in sprinkler system. The Woodlawn Fire Dept. and Police Dept. will be notified from a central ADT office.
 - * An audible alarm will alert all employees of a fire and designate the location by special code.
 - * Security guard will direct Police and Fire Dept. to location and operate signaling devices for resetting.

- Borden Emergency Response Team members will go directly to the area and carry out the existing emergency procedures for fire containment. The Emergency Coordinator will select a member to survey the perimeter of the damaged area to proceed to contain any environmental spills.
- * Trenches will be dug if necessary to divert contaminated water run-off from sprinkler system.
- * In those areas that contain hazardous chemicals, we will alert Fire Dept. about containment.
- * After the emergency, we will ensure that contaminated spills, if any, are removed, containerized and disposed in a suitable manner.
- * All containment and disposal procedures would be followed and supervised by the Emergency Coordinator.

9. Required Reports

- Borden Inc. will notify the EPA regional administration, the Ohio EPA and Woodlawn jurisdictional authorities that the incident has been contained, hazardous material removed and either stored or disposed in suitable manner--that the follow-up actions have been completed.
- Borden Inc. will record time, date, and details of any incident requiring implementation of this contingency plan and will submit a written report of the incident to the EPA regional administrator in accordance with 40CFR 265.56(j).
- The contingency plan will be revised, if necessary, after each emergency when it is clear that the plan did not cover the actual situations. Copies will be sent to each holder of the original plan.





BORDEN PRINTING INC
EFFLUENT SYSTEM
 WOODBRIDGE

Dwg # 000-001 11/12/81

D. Corrective Action

HRE-8J

FEB 12 1992

Ms. Judy Purcer
c/o Heitman Properties
9601 Wilshire Boulevard
Suite 200
Beverly Hills, California 90210

Re: Sperry Vickers
MID 083 430 348

Dear Ms. Purcer:

Per your request of February 6, 1992, enclosed please find a copy of the Preliminary Assessment/Visual Site Inspection for the referenced facility.

The executive summary and conclusions and recommendations section have been withheld as enforcement confidential.

If you have any questions, please contact me at (312) 886-4448.

Sincerely yours,

**ORIGINAL SIGNED BY
KEVIN M. PIERARD**

Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch

Enclosure

HRE-8J:FHARRIS:6-2884:2/11/92:MASTER.RES

OFFICIAL FILE COPY

CONCURRENCE REQUESTED FROM REB			
OTHER STAFF	REB STAFF	REB SECTION CHIEF	REB BRANCH CHIEF
	<i>EPH</i> <i>2/11/92</i>	<i>PM</i> <i>2/12/92</i>	



U.S. Environmental Protection Agency
Office of Waste Programs Enforcement
Contract No. 68-W9-0006



TES 9

**Technical Enforcement Support
at Hazardous Waste Sites
Zone III
Regions 5,6, and 7**



PRC Environmental Management, Inc.

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
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**PRELIMINARY ASSESSMENT/
VISUAL SITE INSPECTION**

**HUBERT GROUP TECHNICAL AND
ENGINEERING CENTER
(FORMERLY SPERRY VICKERS)
MADISON HEIGHTS, MICHIGAN
MID 083 430 348**

FINAL REPORT

Prepared for

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460**

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EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Hubert Group Technical and Engineering Center (Hubert) facility in Madison Heights, Michigan. This report summarizes the results of the PA/VSI and evaluates the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified.

The Hubert facility at 32661 Edward Street, Madison Heights, Michigan, was formerly owned by Sherman's Building Company and operated by Sperry Vickers (Sperry). Sperry assembled and repaired hydraulic pumps, valves, and motors until 1982. Sperry began its operations at the facility in 1977.

Sperry generated and managed hazardous wastes containing trichloroethene (F001, F002, U228), mineral spirits (D001), toluene (U220), sodium hydroxide (D002), petroleum distillates (D003) and paint residues (F017). Other possible waste stream constituents are not known. Wastes were accumulated in 55-gallon drums and were stored in the outdoor storage area.

The U.S. Environmental Protection Agency (EPA) received a RCRA Part A permit application for the facility from Sperry in 1980. The permit application allowed Sperry to store 1,320,000 gallons of F001, F002, U228, D001, U220, and D002 wastes in containers in the outdoor storage area. The permit application was amended by Sperry in 1981, deleting waste codes F002 and U220, and adding paint residue (F017). In June 1982, Sperry submitted a closure plan for the facility to EPA. The closure was certified by Sperry and an independent, registered, professional engineer. EPA acknowledged receipt of the closure certification December 8, 1982. No information is available regarding EPA's acceptance of the closure certification. In 1983, Michigan Department of Natural Resources (MDNR) inspected the closure. No information is available regarding MDNR's closure inspection.

From 1983 to 1989, Johnson Control, Inc. Automotive (JCI) leased and occupied the site. JCI designed electronic automotive equipment. JCI did not manufacture equipment or generate hazardous waste at the facility. The Heitman Advisory Group presently owns the property. The facility is still leased to JCI, who has subleased the facility to Hubert since 1989.

The Hubert facility designs and manufactures fixtures and gages used to measure the precision of automobile and aircraft parts. Hubert has not filed a notification of hazardous waste activity or a RCRA Part A permit application with EPA for the facility. The facility generates

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aluminum, steel, and ammonia waste, which is managed as nonhazardous waste. The facility has operated at its current location since 1989. It occupies 2.5 acres in an industrial area and employs about 65 people.

The PA/VSI identified the following two SWMUs at the facility:

Solid Waste Management Units

1. Outdoor Storage Area
2. Accumulation Areas

MDNR and EPA files do not contain any evidence of documented releases from the outdoor storage area, and PRC did not observe any signs of releases at the facility during the VSI.

Groundwater is not used as a drinking water supply. The nearest wells are greater than one mile northeast and southeast from the facility. The topography around the facility is nearly level. The nearest surface water, an unnamed creek, is 0.75 miles south and downgradient from the facility. No sensitive environments are located on site. Wetland areas are located one mile south and one mile northeast of the facility, and forested areas are located 0.33 miles southeast of the facility.

Residential areas are located 0.25 miles west of the facility. The nearest school, Hiller School, is located about one mile south of the facility. Facility access is controlled by a receptionist at the front entrance and a locked fence secures the outdoor storage area.

The potential for a past release to the environment is low. The outdoor storage area consisted of a concrete pad enclosed by chain link fence and covered by a roof. The potential for a current release to the environment is low. Scrap metals are routinely swept up and placed into drums in the accumulation areas. A spill of scrap metal would be handled similarly. PRC recommends no further action at this facility.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. R05032 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility.
- Obtain information on the operational history of the facility.
- Obtain information on releases from any units at the facility.
- Identify data gaps and other informational needs to be filled during the VSI.

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA.
- Identify releases not discovered during the PA.
- Provide a specific description of the environmental setting.
- Provide information on release pathways and the potential for releases to each medium.
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases.

The VSI includes interviewing appropriate facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all SWMUs, identifying evidence of releases, initially identifying potential sampling locations, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Hubert Group Technical and Engineering Center (Hubert) facility in Madison Heights, Michigan. The facility was formerly owned by Sherman's Building Company and operated by Sperry Vickers (Sperry), but is currently owned by the Heitman Advisory Group (Heitman) and operated by Hubert. Heitman leased the facility to Johnson Control, Inc. Automotive (JCI), who then subleased the facility to Hubert (Heitman, 1991b). PRC will refer to the facility as the Hubert facility for the remainder of this report. The PA was completed on November 19, 1991. PRC gathered and reviewed information from Oakland County Health Department, U.S. Geologic Survey (USGS), U.S. Department of Agriculture (USDA), U.S. Department of Commerce (U.S. DOC), Michigan Department of Natural Resources (MDNR) and from EPA Region 5 RCRA files. The VSI was conducted on

November 21, 1991. It included interviews with Hubert facility representatives and a walk-through inspection of the facility. Two SWMUs and no AOCs were identified at the facility.

The VSI is summarized and five inspection photographs are included in Attachment A. Field notes from the VSI are included in Attachment B.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, release history, regulatory history, environmental setting, and receptors.

2.1 FACILITY LOCATION

The Hubert facility is located at 32661 Edward Street in Madison Heights, Oakland County, Michigan (latitude 41°31'30" N and longitude 83°05'30" W) as shown in Figure 1. The facility occupies 2.5 acres in an industrial area.

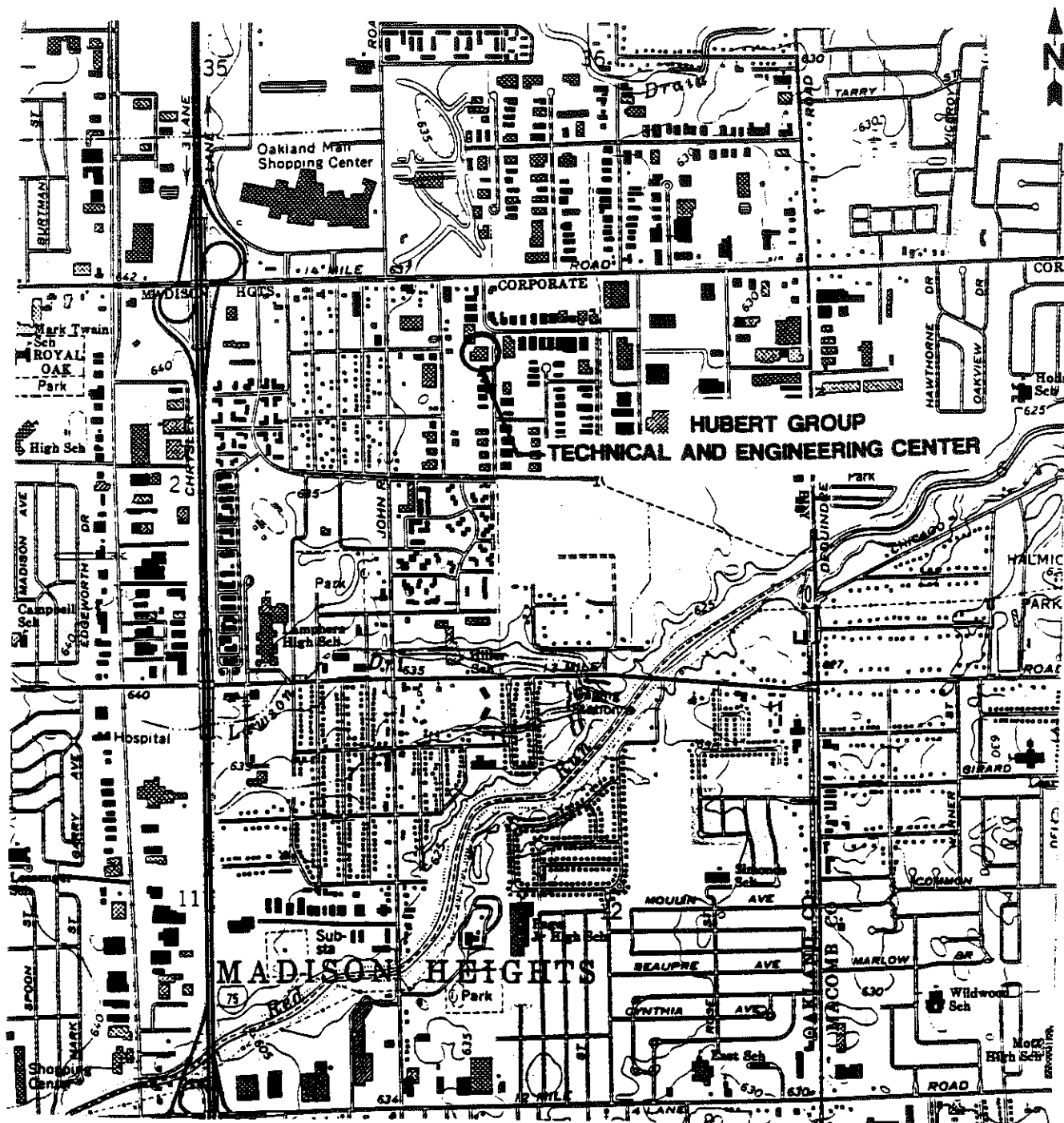
The Hubert facility is bordered on the north, west, and south by office buildings and on the east by Chem Cast Corporation.

2.2 FACILITY OPERATIONS

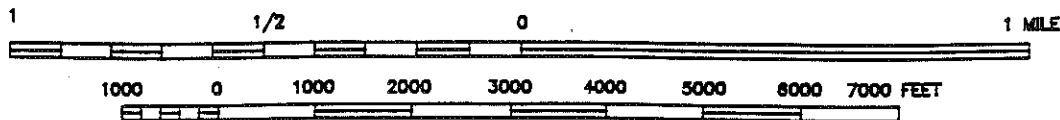
Operations began at the facility January 12, 1977. Sperry assembled and repaired hydraulic pumps, motors, and valves at the facility until 1982. Hazardous wastes were generated during operations and were stored in drums in the outdoor storage area (SWMU 1).

JCI occupied the site from 1983 to 1989. JCI designed electronic automotive equipment. JCI did not manufacture equipment or generate hazardous wastes at the facility (Heitman, 1991b).

Hubert has operated the facility since 1989, and employs about 65 people. The facility consists of one two-story building, 33,000 square feet in area, a driveway, and parking lot. The building space is divided into four company divisions: (1) Models and Tools (M & T), (2) M & T Design, (3) M & T Design Services, and (4) Unitech Engineering (Hubert, 1991a). Hubert designs and manufactures fixtures and gages used to measure the precision of automobile and aircraft parts. Sheets and bars of aluminum and steel are milled according to design specifications. Scrap metal, cleaning rags, and spent ammonia are accumulated throughout the production area. Facility SWMUs are identified in Table 1. The facility layout, including SWMU locations, is shown in Figure 2.



SCALE 1:24,000



SOURCE: MODIFIED FROM USGS, 1980

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FIGURE 1
FACILITY LOCATION

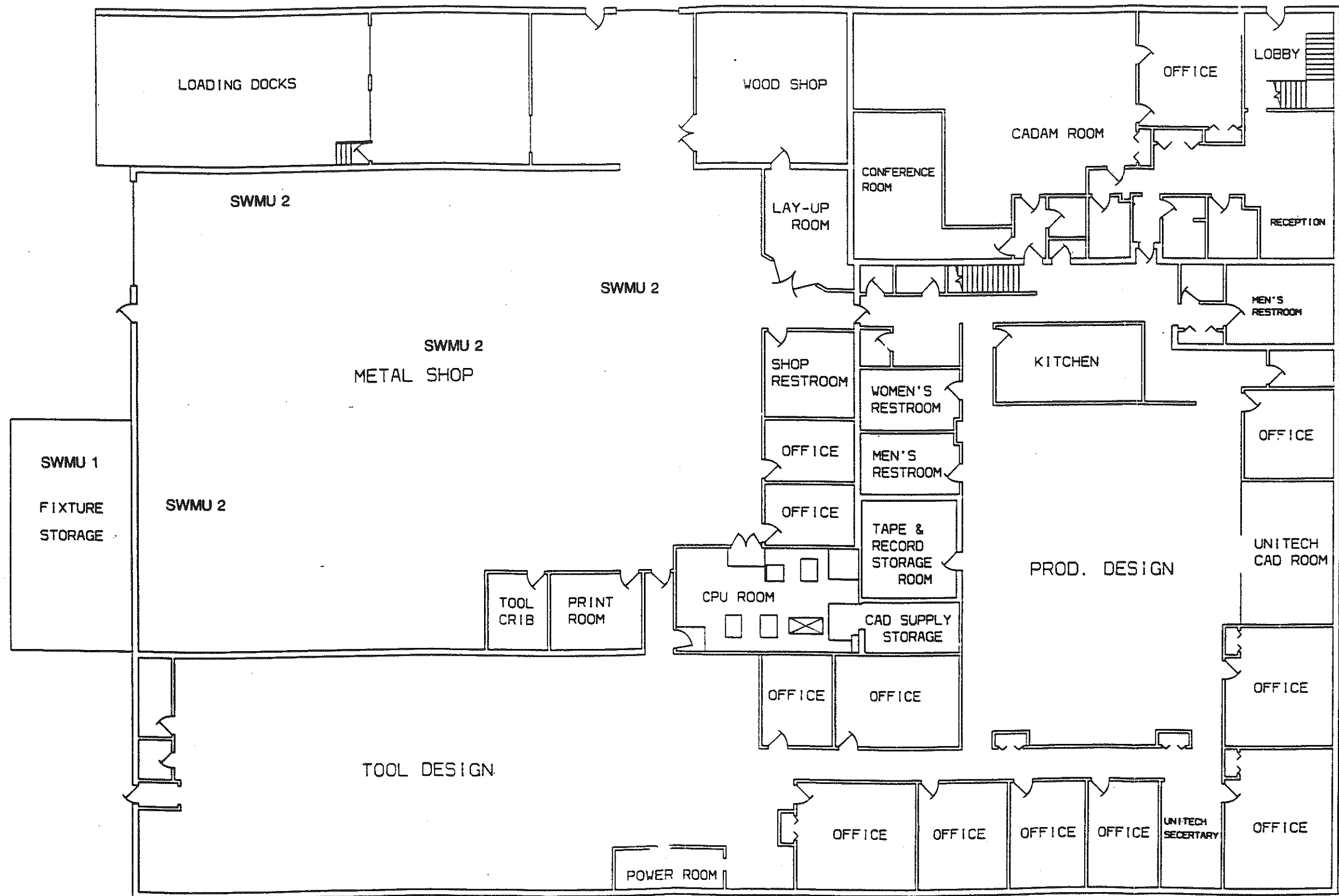
PRC ENVIRONMENTAL MANAGEMENT, INC.

TABLE 1
SOLID WASTE MANAGEMENT UNITS (SWMU)

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit*	Status
1	Outdoor Storage Area	Yes	Closed
2	Accumulation Areas	No	Active-Nonhazardous Storage

Note:

- * A RCRA hazardous waste management unit is one that currently requires or formerly required a RCRA Part A or Part B permit.
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FIGURE 2
FACILITY LAYOUT

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2.3

WASTE GENERATING PROCESSES

The primary waste streams generated by Sperry included spent solvents, corrosives, reactives, and paint residues. The wastes were generated from assembly and repair of hydraulic pumps, motors, and valves (Sperry, 1980a).

The primary waste streams presently generated at the Hubert facility include aluminum and steel scrap, spent ammonia, and used cleaning rags. Hubert manages all wastes as nonhazardous wastes. These wastes are generated from the production of fixtures, gages, and blueprints. Wastes generated at the facility are discussed below and are summarized in Table 2. Monthly generation rates are based on 2 years of waste generation data.

Sperry's waste generating processes are unknown. Solvents and corrosives were used as cleaning aids. Paint residues were generated from industrial painting. The accumulated hazardous wastes were stored in drums in the outdoor storage area (SWMU 1) [Clayton Environmental Consultants, Inc. (Clayton), 1982]. While Sperry operated the facility, the outdoor storage area consisted of a concrete pad, surrounded by a chain-link fence and covered by a roof.

Hubert produces aluminum fixtures and gages by machining and milling aluminum beams and sheets according to design specifications. Machining and milling operations are performed by using lathes and a numerical control mill. Hand-finishing and assembly are also part of the production process. This process generates aluminum scrap and shavings, which is accumulated in the accumulation areas (SWMU 2). About 50 pounds of this waste is generated monthly. This waste is transported off-site for recycling by Miriam Scrap Metal Company.

Hubert produces steel fixtures and gages by machining and milling steel beams and sheets according to design specifications. Machining and milling operations are performed by using a numerical control mill. Hand-finishing and assembly are also part of the process. This process generates steel scrap and shavings, which is accumulated in the accumulation areas (SWMU 2). About 75 pounds of this waste is generated monthly. This waste is transported off-site for disposal by Gwyer Blueprint (Hubert, 1991b).

Specific processes involved in blueprinting are not known. Blueprinting production takes place in the print room. The blueprinting machine uses ammonia in its printing processes. Spent liquid ammonia collects in a 1-gallon container connected to the printer. This waste is accumulated in the accumulation areas (SWMU 2). Six to 12 gallons of ammonia waste are

TABLE 2
SOLID WASTES

<u>Waste/EPA Waste Code</u>	<u>Source</u>	<u>Primary Management Unit</u>
Spent Halogenated Solvents/ F001, F002, U228	Parts Cleaner Area*	1
Spent Cleaning Solvents/ D001, U220	Parts Cleaner Area*	1
Spent Corrosives/D002	Parts Cleaner Area*	1
Spent Reactives/D003	Lubrication Area*	1
Paint Residues/F017	Painting Area*	1
Aluminum Scrap	Metal Lathes and Milling Machines	2
Steel Scrap Metal	Lathes and Milling Machines	2
Spent Ammonia	Blueprint Machine	2
Spent Cleaning Rags	Metal Shop	2

Sources:

Sperry, 1980b, 1981a, and 1981b
Hubert, 1991b

Notes:

Wastes managed in unit 1 were generated by Sperry and are no longer generated at the facility. Wastes managed in unit 2 are currently generated by Hubert.

* Information regarding specific waste generating processes of Sperry is not available. It is likely that these wastes were generated from the sources listed given the information listed in the Part A permit application.

generated monthly. This waste is transported off-site for disposal by Gwyer Blueprint (Hubert, 1991b). Volatilized ammonia is vented out of the building through a ceiling ventilation system located above the blueprinting machine.

In addition to the metal wastes generated by the fixture and gage production processes described above, Hubert generates spent cleaning rags. Hand-finishing and assembly operations include cleaning the fixtures. These processes generate spent cleaning rags soiled with alcohol, methanol, prepsol, and thinner. This waste is accumulated in the accumulation area (SWMU 2). About 50 pounds of rags soiled with 2 to 3 gallons of alcohol and methanol and 0.5 to 1 gallon of prepsol are generated monthly. This waste is managed as nonhazardous and is transported off-site for disposal by Browning-Ferris Industries Disposal Service (Hubert, 1991b).

2.4 HISTORY OF DOCUMENTED RELEASES

MDNR and EPA files do not contain evidence of any documented releases from the hazardous waste outdoor storage area (SWMU 1) at the facility. PRC did not observe any signs of release during the VSI.

2.5 REGULATORY HISTORY

Sperry submitted a notification of hazardous waste activity to EPA on August 18, 1980 (Sperry, 1980a). Sperry submitted a RCRA Part A permit application on November 14, 1980 (Sperry, 1980b). This application allowed Sperry to store 1,320,000 gallons of hazardous waste in drums. Annual estimated quantity, waste types, and waste codes included 17,000,000 pounds of spent halogenated solvents (F001, F002) and trichloroethene; 17,012,000 pounds of flammable cleaning solvent (D001) and toluene (U220); and 5,000,000 pounds of corrosive waste D002 (Sperry, 1980b and 1981b).

Sperry filed a waste characterization report with MDNR on August 12, 1981, listing sodium hydroxide, waste trichloroethene, petroleum distillate, and mineral spirits (Sperry, 1981b). Sperry filed an amendment to the Part A permit application with EPA in March 1981, deleting spent halogenated solvents (F002) and toluene (U220) and adding 12,000 pounds of storage of paint residues (F017) (Sperry, 1981a). MDNR, Office of Hazardous Waste Management, sent a warning to Sperry on August 25, 1981, regarding an improperly filed manifest (MDNR, 1981). Sperry responded on September 4, 1981, forwarding a return copy from the disposal facility to verify the waste disposal (Sperry, 1981c).

On June 2, 1982, Sperry submitted a closure plan for the site to EPA (Sperry, 1982a). On August 27, 1982, MDNR inspected the site and filed a RCRA inspection report (MDNR, 1982). EPA approved the closure plan on August 31, 1982 (U.S. EPA, 1982a). On October 1, 1982, Sperry filed a closure certification with EPA, for closure activities conducted by Clayton (Sperry, 1982b). EPA confirmed receipt of the closure certification on December 3, 1982 (EPA, 1982b). No information is available regarding EPA's acceptance or rejection of the closure certification. On June 22, 1983, MDNR filed a RCRA inspection report of the facility closure (MDNR, 1983). No information is available regarding MDNR's closure inspection.

Hubert has not filed a notification of hazardous waste activity, nor a RCRA Part A permit application for the facility. The facility is not currently and has never been regulated by any federal or state air or water discharge permits.

2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and ground water in the vicinity of the Hubert facility.

2.6.1 Climate

The climate in Oakland County is temperate. The average daily temperature is 58.0°F. The lowest average daily temperature is 22.6°F in January. The highest average daily temperature is 72.2°F in July (U.S. DOC, 1963).

The total annual precipitation for the county is 29.55 inches (USDA, 1982). The mean annual lake evaporation for the area is about 30 inches (U.S. DOC, 1963). The 1-year, 24-hour, maximum rainfall is 2.5 inches (U.S. DOC, 1963).

The prevailing wind is from the southwest. Average wind speed is highest in March at 12 miles per hour (USDA, 1982). The average wind speed is 9 miles per hour during the summer (National Oceanic and Atmospheric Administration, 1989).

The average annual growing season is 141 days, occurring from May through September (USDA, 1982).

2.6.2 Flood Plain and Surface Water

The Hubert facility is not located in a 500-year or 100-year flood plain (Madison Heights City Hall, 1991). The nearest surface water body, an unnamed creek, is located 0.75 miles south of the facility and is used for recreational purposes. This surface water body discharges to Red Run Creek. Red Run Creek discharges to Clinton River, which ultimately discharges to Lake St. Clair.

Surface water drainage at the facility is to the southeast toward the unnamed creek and Red Run Creek. The topography of the facility area is nearly level; as such, drainage is probably minimal. Surface water runoff drains onto the lawns of the facility which are adjacent to the buildings on the east, west, and north sides. Runoff also drains onto the asphalt driveways that drain into the city storm drainage sewers, which discharge into the unnamed creek.

2.6.3 Geology and Soils

The soil classification for the Hubert facility area is Urban land-Thetford. The Urban Land designation refers to the predominance of buildings, asphalt, sidewalks, and other structures that alter the soils (60 percent of surface area). Thetford soils consist of a surface layer of very dark, gray-brown, loamy, fine sand about 9 inches deep underlain by a layer of light yellowish-brown, loamy, fine sand about 11 inches deep. Underlying these layers to a depth of about 60 inches is brown, loose, fine sand. Thetford soils occur on nearly level areas forming in lake plains and outwash plains. These soils are classified as somewhat poorly drained (USDA, 1982).

The upper Devonian Berea Sandstone forms the boundary between the uplands and lowlands of southeastern Michigan. Formations older than the Berea underlie the present plains. Surficial geology in Oakland County is characterized by glacial till deposits of the Wisconsin Age. The southeastern corner of the county is further characterized by tills, nearly level to gently sloping (USDA, 1982). The tills are not well sorted and do not provide large water yields. However, sand lenses found throughout the area may provide adequate supplies for some communities (U.S. EPA, 1981).

2.6.4 Ground Water

No hydrogeologic characterization of the Hubert facility area is available. The aquifer underlying the county is primarily sand and gravel of the Pleistocene Age. The Berea formation is a low-yielding aquifer. Well depths surpassing 200 feet would be required due to the thickness

of the overlying glacial till (U.S. Department of the Interior, 1972). Drinking water well records were not kept in Oakland County until 1966. Records since 1966, show no wells within the city of Madison Heights (Oakland County Health Department, 1991). The nearest wells are greater than one mile northeast and southeast from the facility (Macomb County Health Department, 1991).

2.7 RECEPTORS

The Hubert facility occupies 2.5 acres in an industrial area in Madison Heights, Michigan. Madison Heights has a population of about 35,375 (Rand McNally, 1990).

The Hubert facility is bordered on the north, west, and south by industrial office buildings, and on the east by Chem Cast Corporation. The nearest school, Hiller School, is located about 1 mile south of the facility. Residential areas are located 0.25 mile west and 0.50 mile south of the area. Facility access is controlled by a receptionist at the front entrance, and a locked fence secures the outdoor storage area (SWMU 1).

Ground water is not used as a drinking water supply. Records kept by the Oakland County Health Department since 1966, indicated that no drinking water wells are located in Madison Heights. Drinking water for Madison Heights is provided by the City of Detroit. The Lake Michigan water intake that supplies the Madison Heights area is located on Belle Isle. The water is treated at the Northeast Plant filtration facility (MDNR, 1991).

Sensitive environments are not located on site. The nearest wetland areas are located 1 mile south and 1 mile northeast of the facility, and forested areas are located 0.33 mile southeast of the facility.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the two SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC observations.

SWMU 1

Outdoor Storage Area

Unit Description:

This unit is located outdoors on the west side of the facility. Sperry used the unit as temporary storage for drums of hazardous wastes until they were transported off site for disposal. Hubert uses the unit to store fixtures no longer used in the facility.

The unit measures 15 feet by 60 feet. The unit consists of a concrete floor surrounded by a chain-link fence and a wooden 6-foot-tall fence and is covered by a metal roof (see Photograph Nos. 1 and 2).

Date of Startup:

This unit began operation in 1977. This unit was in operation as a hazardous waste drum storage area during Sperry's operation of the facility until 1982.

Date of Closure:

The unit has been inactive since September 22, 1982, and has undergone RCRA closure.

Wastes Managed:

This unit managed wastes containing trichloroethene (F001, F002, U228), mineral spirits (D001, U220), sodium hydroxide (D002), petroleum distillates (D003), and paint residues (F017) in containers. Wastes from this unit were ultimately transported off site for disposal.

Release Controls:

The floor of the outdoor storage area is constructed of concrete. A metal roof limits the amount of water that could accumulate in the area.

History of Documented Releases:

No releases from this unit have been documented.

Observations: During the VSI the unit contained a 10-foot by 20-foot thermally insulated drying oven, two empty 55-gallon drums, and other fixtures no longer in use. PRC observed no visible cracks in the concrete pad. The chain-link fence was secured by a lock. During the VSI, PRC did not observe any signs of a release from this unit.

SWMU 2

Accumulation Areas

Unit Description: The accumulation areas are located throughout the metal shop (see Figure 2) and consist of 55-gallon drums and 1-gallon containers (see Photograph Nos. 3, 4, and 5). These units are used to collect scrap aluminum, scrap steel, spent cleaning rags, and spent ammonia. These wastes are managed as nonhazardous wastes.

Date of Startup: The unit began operations in 1989.

Date of Closure: The unit is active.

Wastes Managed: The unit manages scrap aluminum, steel, spent cleaning rags, and spent ammonia. Waste aluminum is recycled off site. Waste steel, spent cleaning rags, and spent ammonia are ultimately transported off-site for disposal.

Release Controls: The floor throughout the metal shop is concrete. PRC observed no cracks in the floor or floor drains.

History of Documented Releases: No releases from this unit have been documented.

Observations: The units contained scrap metal shavings in amounts ranging from about one-third to one-half of the drums' capacities. Spent cleaning rags were also observed in closed drums. During the VSI, PRC did not observe any containers of spent ammonia; however, copies of ammonia disposal pickup invoices were provided. No evidence of release was noted.

4.0 AREAS OF CONCERN

PRC identified no AOCs during the PA/VSI.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified two SWMUs and no AOCs at the Hubert facility. Background information on the facility's location, operations, waste generating processes, release history, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is discussed in Section 3.0. Table 3 identifies the SWMU's at the Hubert facility and suggested further actions. Following are PRC's conclusions and recommendations for each SWMU.

SWMU 1

Outdoor Storage Area

Conclusions:

From the information available during the PA/VSI, the unit posed a low potential for past releases to the environment. The unit has been closed since 1982, and a potential for release no longer exists. The unit is used as a fixture storage area. The potential for release to environmental media is detailed below.

Ground Water, Surface Water, Air, and On-Site Soils (Past): Low.

This unit was used to store drums containing hazardous wastes generated at the facility. The concrete floor is sound and free of cracks. The roof extended over the entire storage area and there was no evidence of any releases from this unit.

Ground Water, Surface Water, Air, and On-Site Soils (Present): None.

No hazardous waste is stored in the unit.

Recommendations:

PRC recommends no further action for this unit.

SWMU 2

Accumulation Areas

Conclusions:

This unit poses no threat of potential release to the environment. The unit does not store hazardous wastes.

Ground Water, Surface Water, Air, and On-Site Soils: None.

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TABLE 3
SWMU SUMMARY

<u>SWMU</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Suggested Further Action</u>
1. Outdoor Storage Area	1977 to 1982	None	No further action
2. Accumulation Areas	1989 to present	None	No further action

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Metal wastes are routinely swept up and deposited into the drums. Spent cleaning rags are also collected in drums. Neither require special handling. Spent ammonia is not generated in a large enough quantity to qualify as a release. PRC observed no signs of release from the units.

Recommendations: PRC recommends no further action for these units.

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ATTACHMENT A
VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

**Hubert Group Technical and Engineering Center
Madison Heights, Michigan
MID 083 430 348**

Date: November 21, 1991

Facility Representatives: Phil Neale, Hubert Group, Models & Tools, Inc. (Hubert)

Inspection Team: Gabrielle Norkis, PRC Environmental Management, Inc. (PRC)
Celeste Brancel, PRC

Photographer: Celeste Brancel

Weather Conditions: Calm, overcast, temperature about 45°F

Summary of Activities: The visual site inspection (VSI) began at 1:30 p.m. with an introductory meeting. The inspection team discussed the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the Hubert facility's past and current operations, solid wastes generated, and release history. Most of the information was exchanged on a question-and-answer basis. Hubert provided the inspection team with copies of documents requested.

The facility walk-through began at 1:45 p.m. Hubert representative escorted PRC through the main floor operations. Hubert representatives indicated where and how wastes were generated from the production processes in the Metal Shop. The tour proceeded to the outdoor storage area. The gate to the outdoor storage area was unlocked, and PRC inspected the area.

The tour concluded at 2:15 p.m., after which the inspection team held an exit meeting with Mr. Neale. The VSI was completed and the inspection team left the facility at 2:25 p.m.



Photograph No. 1

Orientation: South

Location: SWMU 1

Date: November 21, 1991

Description: This picture shows the outdoor storage area as seen from outside its entry.



Photograph No. 2

Orientation: South

Location: SWMU 1

Date: November 21, 1991

Description: This picture shows the inside of the outdoor storage area as seen from its entry.



Photograph No. 3

Orientation: West

Location: SWMU 2

Date: November 21, 1991

Description: This picture shows a metal scrap accumulation area in the metal shop.



Photograph No. 4

Orientation: South

Location: SWMU 2

Date: November 21, 1991

Description: This picture show a metal scrap accumulation area in the metal shop.



Photograph No. 5

Orientation: North

Description: This picture show a metal scrap accumulation area in the metal shop.

Location: SWMU 2

Date: November 21, 1991

ATTACHMENT B
VISUAL SITE INSPECTION FIELD NOTES

Mag. note - to Chem Waste

100

Moved in in August 1989.

Prior tenant was Johnson

Controls (Automotive Supplies).

Fabrication of electrical work.

33,000 square feet.

Design origins - North

aluminum & resell

stiff steel \Rightarrow scrap it

buy sheet steel then cut it

Have an alarm system.

The degreasers on rags & throw
it in garbage. Mechanically.

The lubricating oil that's
always recycled. Never

taken out. Vytro-N
is the lubricant oil.
Collect scrap metal
shavings & put in
dumpster.

RECEIVED
DATE 6/26/92
RIN #
INITIALS SP/MS

ENFORCEMENT
CONFIDENTIAL

CORRECTIVE ACTION STABILIZATION QUESTIONNAIRE

Completed by: Mary Wojciechowski

Date: June 4, 1992

Background Facility Information

Facility Name: Hubert Group Technical & Engineering Center
EPA Identification No.: MID 083 430 348
Location (City, State): Madison Heights, Michigan
Facility Priority Rank: Low

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WMD RECORD CENTER

OCT 18 1993

1. Is this checklist being completed for one solid waste management unit (SWMU), several SWMUs, or the entire facility? Explain.

Entire Facility

2 SWMUs

Status of Corrective Action Activities at the Facility

2. What is the current status of HSWA corrective action activities at the facility?
- ☐ No corrective action activities initiated (Go to 5)
 - ☒ RCRA Facility Assessment (RFA) or equivalent completed
 - ☐ RCRA Facility Investigation (RFI) underway
 - ☐ RFI completed
 - ☐ Corrective Measures Study (CMS) completed
 - ☐ Corrective Measures Implementation (CMI) begun or completed
 - ☐ Interim Measures begun or completed

3. If corrective action activities have been initiated, are they being carried out under a permit or an enforcement order?

- ☐ Operating permit
- ☐ Post-closure permit
- ☐ Enforcement order
- ☒ Other (Explain)

No corrective action has been initiated.

4. Have interim measures, if required or completed [see Question 2], been successful in preventing the further spread of contamination at the facility?

- ☐ Yes
- ☐ No
- ☐ Uncertain; still underway
- ☒ Not required

Additional explanatory notes:

There is no history or suspicion of releases to environmental media at this facility.

Hubert Group Technical & Engineering Center

Facility Releases and Exposure Concerns

5. To what media have contaminant releases from the facility occurred or been suspected of occurring?

None

- ☐ Ground water
- ☐ Surface water
- ☐ Air
- ☐ Soils

6. Are contaminant releases migrating off-site?

- ☐ Yes; Indicate media, contaminant concentrations, and level of certainty.

Groundwater:

Surface water:

Air:

Soils:

- ☒ No
- ☐ Uncertain

- 7a. Are humans currently being exposed to contaminants released from the facility?

- ☐ Yes (Go to 8a)
- ☒ No
- ☐ Uncertain

Additional explanatory notes:

There is no history or suspicion of releases to environmental media at this facility.

- 7b. Is there a potential for human exposure to the contaminants released from the facility over the next 5 to 10 years?

- ☐ Yes
- ☒ No
- ☐ Uncertain

Additional explanatory notes:

There is no history or suspicion of releases to environmental media at this facility.

- 8a. Are environmental receptors currently being exposed to contaminants released from the facility?

- ☐ Yes (Go to 9)
- ☒ No
- ☐ Uncertain

Additional explanatory notes:

There is no history or suspicion of releases to environmental media at this facility.

- 8b. Is there a potential that environmental receptors could be exposed to the contaminants released from the facility over the next 5 to 10 years?

- ☐ Yes
- ☒ No
- ☐ Uncertain

Additional explanatory notes:

There is no history or suspicion of releases to environmental media at this facility.

Anticipated Final Corrective Measures

9. If already identified or planned, would final corrective measures be able to be implemented in time to adequately address any existing or short-term threat to human health and the environment?

- ☐ Yes
- ☒ No
- ☐ Uncertain

Additional explanatory notes:

There is no history or suspicion of releases to environmental media at this facility.

10. Could a stabilization initiative at this facility reduce the present or near-term (e.g., less than two years) risks to human health and the environment?

- ☐ Yes
☒ No
☐ Uncertain

Additional explanatory notes:

There is no history or suspicion of releases to environmental media at this facility.

11. If a stabilization activity were not begun, would the threat to human health and the environment significantly increase before final corrective measures could be implemented?

- ☐ Yes
☒ No
☐ Uncertain

Additional explanatory notes:

There is no history or suspicion of releases to environmental media at this facility.

Technical Ability to Implement Stabilization Activities

12. In what phase does the contaminant exist under ambient site conditions? Check all that apply.

- ☐ Solid
☐ Light non-aqueous phase liquids (LNAPLs)
☐ Dense non-aqueous phase liquids (DNAPLs)
☐ Dissolved in ground water or surface water
☐ Gaseous
☒ Other None

13. Which of the following major chemical groupings are of concern at the facility?

- ☒ Volatile organic compounds (VOCs) and/or semi-volatiles
☐ Polynuclear aromatics (PAHs)
☐ Pesticides
☐ Polychlorinated biphenyls (PCBs) and/or dioxins
☐ Other organics
☐ Inorganics and metals
☐ Explosives
☐ Other _____

14. Are appropriate stabilization technologies available to prevent the further spread of contamination, based on contaminant characteristics and the facility's environmental setting? [See Attachment A for a listing of potential stabilization technologies.]

☐ Yes; Indicate possible course of action.

☒ No; Indicate why stabilization technologies are not appropriate; then go to Question 18.

There is no history of suspicion of releases to environmental media at this facility.

15. Has the RFI, or another environmental investigation, provided the site characterization and waste release data needed to design and implement a stabilization activity?

☐ Yes
☐ No

If No, can these data be obtained faster than the data needed to implement the final corrective measures?

☐ Yes
☐ No

Timing and Other Procedural Issues Associated with Stabilization

16. Can stabilization activities be implemented more quickly than the final corrective measures?

☐ Yes
☐ No
☐ Uncertain

Additional explanatory notes:

17. Can stabilization activities be incorporated into the final corrective measures at some point in the future?

☐ Yes
☐ No
☐ Uncertain

Additional explanatory notes:

18. Is this facility an appropriate candidate for stabilization activities?

- Explain final decision, using additional sheets if necessary.

There is no history of suspicion of releases to environmental media at this facility.

[illegible]